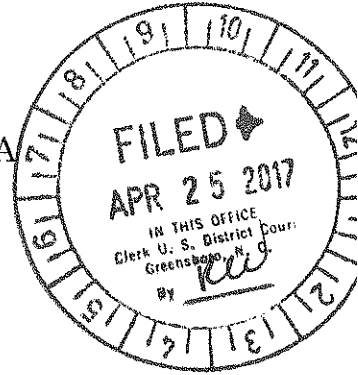


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

TODD MICHAEL GORI

1:17CRJ46-1

The Grand Jury charges:

COUNT ONE

On or about April 18, 2016, in the County of Orange, in the Middle District of North Carolina, and elsewhere, TODD MICHAEL GORI did knowingly and with intent to extort money and other things of value from TSI Healthcare, Inc., transmit in interstate commerce a communication containing a threat to cause damage to a protected computer; in violation of Title 18, United States Code, Section 1030(a)(7)(A) and (c)(3)(A).

COUNT TWO

On or about March 1, 2017, in the County of Orange, in the Middle District of North Carolina, and elsewhere, TODD MICHAEL GORI, with intent to extort from a corporation money and other things of value, knowingly transmitted in interstate commerce from the State of Washington, to Chapel

Hill, in the State and Middle District of North Carolina, communications containing a threat to travel to North Carolina, buy a gun, come to the offices of TSI Healthcare, Inc., and shoot people; in violation of Title 18, United States Code, Section 875(b).

COUNT THREE

On or about March 30, 2017, in the County of Orange, in the Middle District of North Carolina, and elsewhere, TODD MICHAEL GORI did knowingly and with intent to extort money and other things of value from TSI Healthcare, Inc., transmit in interstate commerce a communication containing a threat to cause damage to a protected computer; in violation of Title 18, United States Code, Section 1030(a)(7)(A) and (c)(3)(A).

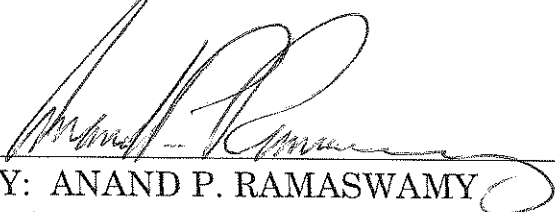
COUNT FOUR

On or about March 30, 2017, in the County of Orange, in the Middle District of North Carolina, and elsewhere, TODD MICHAEL GORI, with intent to extort from a corporation money and other things of value, knowingly transmitted in interstate commerce from the State of Washington, to Chapel Hill, in the State and Middle District of North Carolina, communications containing a threat to injure the property and reputation of TSI Healthcare,

Inc., including its computer network and business operations; in violation of Title 18, United States Code, Section 875(d).

DATED: April 24, 2017

SANDRA J. HAIRSTON
Acting United States Attorney



BY: ANAND P. RAMASWAMY
Assistant United States Attorney

A TRUE BILL: